NPRM 16-239 COMMENTS

These comments are in opposition to the proposed rule making 16-239. The original ARRL petition was for both a removal of baud rate limitations and the setting of a limit on signal bandwidth. Removing the baud rate limit is a good idea because it allows for more experimentation with newer digital modes. Experimentation and advancement of the art of communications are important fundamentals of the Amateur Radio Service. The FCC has proposed a rule making that does the first but sets no signal bandwidth limit. Modern technology shows that whatever symbol rate one adopts, using QAM technology one can produce a very wide signal bandwidth that essentially usurps a large swath of scant spectrum. There is no need in the amateur service for having a possibility of such wide signal bandwidth. Allowing very wide bandwidth signals could allow one or two stations to completely monopolize an entire frequency band, preventing any other communications from taking place. Therefore, without stipulating some maximum signal bandwidth, such as 500 Hz or even 2.7 KHz, I am opposed to the proposed rule making. It could have serious unintended consequences.

Respectfully submitted,

Michael G Cizek W0VTT 4 October 2016